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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :
v. : MAGISTRATE NO. 11-711
SON HOANG LE : UNDER SEAL

FILED

JUN -7 2011

MICHAEL E. KUNZ, Clerk
By: 1/1 Dep. Clerk

MOTION FOR CONTINUANCE
PURSUANT TO 18 U.S.C. § 3161(h)(8)(A)

The United States of America, by its attorneys, Zane David Memeger, United States Attorney in and for the Eastern District of Pennsylvania, and Daniel A. Vélez, Assistant United States Attorney, respectfully requests a continuance in this matter. In support of this motion, the government avers as follows:

1. Defendant Son Hoang Le was brought into federal custody on or about May 14, 2011, and had his initial appearance on a complaint and warrant on May 16, 2011, charging him with possession with intent to distribute approximately 40,000 pills containing MDMA, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).
2. Pursuant to 18 U.S.C. § 3161(b), an indictment or information in this case must be filed within 30 days, that is, by June 15, 2011.
3. The government and the defendant are presently engaged in negotiations in this case and are discussing a possible pre-indictment disposition of this charge.
4. I have been advised by counsel for the defendant, Earl G. Kauffman, Esquire, that the defendant has no objection to a continuance of this matter.

WHEREFORE, the government respectfully submits that the ends of justice will best be served by a continuance in this matter for a period not to exceed sixty (60) additional

days beyond the last date required for the filing of an indictment under the Speedy Trial Act, that is, until August 14, 2011.

Respectfully submitted,

ZANE DAVID MEMEGER
United States Attorney

/s/ Daniel A. Vélez
DANIEL A. VELEZ
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Government's Motion for a Continuance has been served by electronic filing and/or electronic mail upon:

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FILED

JUN -7 2011

MICHAEL L. WILK, Clerk
By [Signature] Dep. Clerk

/s/ Daniel A. Vélez
DANIEL A. VELEZ
Assistant United States Attorney

Date: June 7, 2011